

**IN THE
UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA**

UNITED STATES	:	
v.	:	Criminal No. 23-159
DENISE LODGE	:	

ORDER

AND NOW, this day of June, 2024, upon the defendant, Denise Lodge's Unopposed Motion to Continue Date for Filing of Objections to Presentence Investigation Report, it is hereby ORDERED that the date for filing objections is extended to July 15, 2024.

BY THE COURT:

HONORABLE CHIEF JUDGE MATTHEW W. BRANN

Hope C. Lefebber, Esquire
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(610) 668-7927

Attorney for Defendant

**IN THE
UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. 23-159
	:	
DENISE LODGE	:	

**DEFENDANT’S UNOPPOSED MOTION TO CONTINUE DATE
FOR
FILING OBJECTIONS TO PRESENTENCE INVESTIGATION REPORT**

The defendant, Denise Lodge, by and through her attorney, Hope C. Lefebber, Esquire, hereby files the instant Unopposed Motion to Continue Date for Filing Objections to Presentence Investigation Report to July 15, 2024, and states as follows:

1. The Presentence Investigation Report (Dkt. #85) was filed on June 10, 2024. Objections are due on June 27, 2024.
2. The undersigned, counsel for defendant Denise Lodge is currently on vacation, returning on June 30, 2024.

3. The Presentence Investigation Report raises novel issues of first impression which require additional legal research and discussion with the government, as these issues were not agreed to between the parties and were not part of the plea agreement.
4. The requested continuance of the date for filing objections to the Presentence Investigation Report will not delay the proceedings as the defendant's sentencing date has not been set as the remaining defendants have not yet been tried.
5. Sean Camoni, Assistant United States Attorney, and Rachel Johnson, U.S. Probation Officer, advise that neither the government nor the U.S. Probation Office have any objection to defendant's request for an extension until July 15, 2024 to file objections.
6. For all of the foregoing reasons, the defense respectfully requests that the date for the filing of objections to the Presentence Investigation Report be continued to July 15, 2024.

WHEREFORE, it is respectfully requested that the instant Motion be GRANTED.

Respectfully,

HOPE C. LEFEBER, LLC

By:

A handwritten signature in cursive script, appearing to read "Hope C. Lefebvre", written in dark ink.

HOPE C. LEFEBER, ESQUIRE

CERTIFICATE OF SERVICE

I certify that a copy of the attached Unopposed Motion to Continue was served upon the counsel of record, by electronic filing, on June 18, 2024:

/s/

HOPE C. LEFEBER